

6.0 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

This section summarizes the environmental advantages and disadvantages associated with the proposed Project and the alternatives. Based upon this discussion, the environmentally superior alternative is selected as required by the California Environmental Quality Act (CEQA).

The CEQA does not provide specific direction regarding the methodology of comparing alternatives and the proposed Project. Each project must be evaluated for the issues and impacts that are most important; this will vary depending on the project type and the environmental setting. Issue areas that are generally given more weight in comparing alternatives are those with significant long-term impacts. Impacts that are short-term (e.g., construction-related impacts) or those that can be mitigated to less than significant levels are generally considered to be less important.

This comparison is designed to satisfy the requirements of the CEQA Guidelines Section 15126.6(d), Evaluation of Alternatives, which states that:

“The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the Project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the Project as proposed.”

In accordance with the CEQA Guidelines Section 15126.6(d) as presented above, this EIR provides sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project and the other alternatives.

The CEQA also requires that the No Project Alternative be evaluated, with its impacts, as part of the EIR (CEQA Guidelines Section 15126.6(e)). As such, the No Project Alternative was not subject to the screening analysis and has been evaluated as an alternative for the Project throughout the EIR.

The discussion below compares impacts associated with the proposed Project with those associated with the No Project Alternative and one other alternative. These

1 impacts are identified as a result of the analysis provided in Section 4.0, Environmental
2 Analysis and as summarized in Section 3.0, Alternatives and Cumulative Projects. An
3 alternative would be considered superior to the proposed Project if there is a reduction
4 in impact classification. In cases where the impact resulting from an alternative is in the
5 same class as for the proposed Project, differences in severity of the impact are
6 analyzed.

7 In evaluating the proposed Project and the alternatives, the key issue areas relate to
8 impacts from installation of the proposed cable offshore, including air quality, biological
9 resources, commercial and recreational fishing, cultural resources, water quality,
10 geologic resources, and noise.

11 **6.1 THE PROPOSED PROJECT VERSUS THE NO PROJECT ALTERNATIVE**

12 The CEQA Guidelines (section 15126.6(e)(2)) state that “If the environmentally superior
13 alternative is the “No Project” alternative, the EIR would also identify an environmentally
14 superior alternative among the other alternatives.”

15 Under the No Project Alternative, the proposed fiber optic cable would not be installed
16 and no construction- or operation-related impacts would occur. However, with no new
17 construction and no existing requirements for restoration, existing onshore erosion
18 areas within the cable corridor would not be repaired. The continuing erosion could
19 result in potentially significant impacts to the geology (through slumping) and water
20 quality (through increasing sedimentation into the water courses) of the Project site.
21 Increased telecommunications demand would continue to grow internationally.
22 Therefore, it is reasonable to assume that new fiber optic cables would be built at other
23 landing locations within the State of California or at other locations along the Pacific
24 Coast.

25 **6.2 THE PROPOSED PROJECT VERSUS MAXIMUM BURIAL ALTERNATIVE**

26 The Maximum Burial Alternative would require AT&T to identify a route that would
27 facilitate maximizing the amount of buried cable within the nearshore and offshore
28 segments of the route from a water depth of 6,000 feet (1,830 m) eastward to the cable
29 conduit located at the landing site. This alternative would result in an increase in the
30 duration of cable laying activities of at least several days and an increase in the amount
31 of sedimentary seafloor that would be disturbed. Because the proposed cable under
32 this alternative would cross existing cables along the revised route, potential system
33 safety and risk of upset impacts would result. This could occur if a cable laying ship

1 were to snag other existing cables while installing the proposed cable; it could also
2 occur during maintenance of the proposed cable in the future. Other increased impacts
3 associated with cable laying activities are also anticipated. Those impacts include:
4 increased air emissions; a longer closure of potential fishing areas otherwise available
5 to local fishermen; increased potential impacts to marine mammals and other marine
6 organisms due to the increase in time required to lay the longer cable; and increased
7 aesthetic impacts from the cable laying ship from onshore viewing areas. While none of
8 these impacts increase the impact category from Class II to Class I, the construction-
9 related impacts are anticipated to be greater for this alternative than for the proposed
10 Project.

11 **6.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

12 Given the relative impacts and merits of the proposed Project and each alternative that
13 was considered in this EIR, and based on the discussion presented above, as designed
14 and with incorporation of the recommended mitigations, the proposed Project is
15 considered to be the environmentally superior alternative.

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